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ASHA DANIELS

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

ASHA DANIELS, an Individual,

Plaintiff,

vs.

BIG GRRRL BIG TOURING, INC, a Delaware Corporation; CAPS PAYROLL, an unknown California Business Organization; MELISSA JEFFERSON (aka “LIZZO”), as an Individual; AMANDA NOMURA, as an individual, and DOES 1 through 10, inclusive,

Defendants.

Case No. 2:24-cv-03571-FLA (PVCx)

Assigned to the Honorable Fernando L. Aenlle-Rocha

**PLAINTIFF’S WITNESS LIST**

Witness's Name*, Title, Affiliation (If Relevant)	Summary of Testimony / Why Testimony Is Unique	Direct Exam (Hours)	Cross Exam (Hours)	Dates of Testimony
Asha Daniels	Plaintiff. First-hand account of (a) offensive WhatsApp image and sexually-charged environment, (b) rack-over-foot/push incident, (c) denial of medical care and PPE, (d) pressure to join sex-show outings, (e) retaliation & termination.	4	2	
Amanda Nomura	Wardrobe Manager and Plaintiff's supervisor Adverse witness on physical assault, threats, denial of accommodations, racist/fat-phobic comments.	3	2	
Carlina Gugliotta	Tour Manager: Admitted Daniels reported racism/sexual harassment; asked Daniels to <i>secretly record</i> Nomura; performed only cursory investigations. The one to end Plaintiff's employment	4	2	
Arianna Davis	Dancer: Corroborates unsafe working conditions (video of inadequate make-up stations); observed Daniels limping & struggling with equipment; confirms dancers lacked privacy and felt mocked.	1	1	

<b>Witness's Name*, Title, Affiliation (If Relevant)</b>	<b>Summary of Testimony / Why Testimony Is Unique</b>	<b>Direct Exam (Hours)</b>	<b>Cross Exam (Hours)</b>	<b>Dates of Testimony</b>
<b>Crystal Williams</b>	Dancer: Confirms Daniels performed her job well; saw her wearing Crocs due to foot pain; no misconduct observed by Daniels—rebutting Defendants' performance pretext.	1	1	
<b>Noelle Rodriguez</b>	Dancer: Testifies to micro-aggressions toward Black dancers; observed blood on Daniels' injured nail; corroborates culture of bullying and insufficient accommodations.	1	1	
<b>Chris Coffie</b>	Tour Production manager, denies ever hearing complaints of racism, bullying, sex-worker discussions, injury reports, etc. His "see-no-evil" stance underscores systemic failure to record or investigate complaints and injuries.	2	1	
<b>Molly Gordon</b>	Wardrobe/Dance-staff supervisor: Identified in testimony as laughing with others while dancers changed and as participant in conversation where Black dancers were mimicked as "ghetto."	2	1	

Witness's Name*, Title, Affiliation (If Relevant)	Summary of Testimony / Why Testimony Is Unique	Direct Exam (Hours)	Cross Exam (Hours)	Dates of Testimony
	Provides direct evidence of racially hostile environment.			
<b>Dulce Martin</b>	Dulce Martin, production-coordinator, documented tour schedules and collected crew medical data. Workers were told to approach her for doctors or complaints. Gugliotta informed her of Daniels–Nomura problems. Martin joined Coffie and Gugliotta in deciding Daniels' dismissal and later texted she wanted to “punch Asha,” evidencing personal hostility toward retaliation claims	2	1	
<b>Dr. Judy Ho</b>	Plaintiff's Retained Expert who will opine on Plaintiff emotional distress based on her own examination and testing of the Plaintiff	2	2	

\*Indicates that witness will be called only if the need arises.

1  
2 Dated: October 14, 2025

WEST COAST EMPLOYMENT LAWYERS, APLC

3  
4 By:



5 Ronald L. Zambrano  
6 Crystal F. Mohsin  
7 Attorneys for Plaintiff,  
8 ASHA DANIELS  
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**PROOF OF SERVICE**

I am employed in the County of Los Angeles, State of California. I am over the age of eighteen and not a party to the within action. My business address is 1147 South Hope Street, Los Angeles, CA 90015.

On October 17, 2025, I served the foregoing documents described as: **PLAINTIFF'S WITNESS LIST** on the interested parties in this action by placing a true copy or original thereof enclosed in a sealed envelope, addressed as follows:


**SEE MAILING LIST**

- ☐ **BY MAIL (FRCP 5):** I am readily familiar with the firm's practice of collection and processing documents for mailing. Under that practice it would be deposited with U.S. Postal Service on that same day with postage thereon fully prepaid at Los Angeles, California, in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.
- ☒ **BY ELECTRONIC MAIL (FRCP 5(b)2(E)):** I caused such documents to be to be sent from the e-mail address marlyn@westcoasttriallawyers.com to the persons at the e-mail address(es) listed in the mailing list. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.
- ☐ **BY PERSONAL SERVICE (FRCP 5):** I caused such documents to be hand-delivered to the office of the addressee.

☐ State      ☒ Federal

I declare under penalty of perjury pursuant to the laws of the State of California and the Federal Government of the United States of America that the foregoing is true and correct.

Executed on October 17, 2025, at Los Angeles, California.



Marlyn Cortez

**MAILING LIST**

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